IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

§	
§	
§	
§	
§	
§	Case No. 2:11-cv-00343
§	
§	
§	
§	JURY TRIAL DEMANDED
§	
§	
§	
§	
§	
	&

TRAFFIC INFORMATION, LLC'S OPPOSED MOTION TO FILE UNDER SEAL PLAINTIFF'S MOTION FOR PROTECTIVE ORDER, MOSTION TO HOLD WOODFOREST NATIONAL BANK IN CIVIL CONTEMPT AND SUPPORTING MEMORANDUM

Plaintiff Traffic Information, LLC, ('Traffic') files this Opposed Motion For Leave to File Under Seal Plaintiff's Motion for Protective Order, Motion to Hold Woodforest National Bank in Civil Contempt and Supporting Memorandum and shows the Court as follows:

Plaintiff's Motion for Protective Order, Motion to Hold Woodforest National Bank in Civil Contempt and Supporting Memorandum is due May 7, 2012. Traffic's Motion contains confidential information. Accordingly, Traffic requests leave to file its Motion under seal.

Respectfully submitted,

Dated: May 7, 2012 By: <u>/s/ C. Dale Quisenberry</u>

C. Dale Quisenberry State Bar No. 24005040 dquisenberry@pqelaw.com

John T. Polasek

State Bar. No. 16088590 tpolasek@pqelaw.com

Jeffrey S. David

State Bar No. 24053171 jdavid@pgelaw.com

POLASEK, QUISENBERRY & ERRINGTON, L.L.P.

6750 West Loop South, Suite 920

Bellaire, Texas 77401 Telephone: (832) 778-6000 Facsimile: (832) 778-6010

S. Calvin Capshaw
State Bar No. 03783900
ccapshaw@capshawlaw.com
Elizabeth L. DeRieux
State Bar No. 05770585
ederieux@capshawlaw.com
CAPSHAW DERIEUX, L.L.P.
114 East Commerce Avenue
Glaswater, Texas 75647
Telephone: (903) 236-9800
Facsimile: (903) 236-8787

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7(h), I hereby certify that counsel for Traffic Information, LLC contacted counsel for Woodforest National Bank via telephone on May 7, 2012 to determine whether they would be opposed to the instant motion. Counsel advised that Woodforest opposes this motion to seal.

/s/ C. Dale Quisenberry
C. Dale Quisenberry

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 7th day of May, 2012, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by, electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ C. Dale Quisenberry